

**EXHIBIT B**

**DECLARATION OF MARC WOLINSKY  
IN FURTHER SUPPORT OF DEFENDANT HP'S MOTION TO STAY**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NASSER MORADI, et al., ) Case Nos. 2:11-cv-490-MMD-(RJJ) (base);  
Plaintiffs, ) 2:11-cv-595 (related); 2:11-cv-636 (related)  
v. )  
SHELDON GARY ADELSON, et al., )  
Defendants. )  
)

**DECLARATION OF DANIEL BOOKIN**

I, Daniel Bookin, hereby declare:

1. I am a partner in the law firm of O'Melveny & Myers LLP, attorneys for the Special Litigation Committee investigating the allegations in this action. I submit this declaration to supplement the parties' Joint Status Update being filed in accordance with this Court's Order of August 17, 2012.

2. On June 10, 2011, the Board of Las Vegas Sands Corp. ("the Company") ratified an earlier decision authorizing its Audit Committee—composed of three outside directors, Messrs. Irwin Siegel, Jason Ader, and Jeffrey Schwartz—to respond to a subpoena from the Securities and Exchange Commission ("SEC") and an inquiry from the Department of Justice ("DoJ") concerning the Company's operations in Macau. The Board also authorized the Audit Committee to retain any outside counsel or other advisors necessary to perform those responsibilities. On July 26, 2011, the Board designated the Audit Committee as a "special litigation committee," and expanded the Audit Committee's powers and responsibilities to include investigating the allegations in the above-captioned action.

3. Pursuant to the authority ratified on June 10 and July 26, 2011, the Audit Committee retained my law firm to assist with an independent investigation of the matters raised in the SEC subpoena, the DoJ inquiry, and the above-captioned action.

4. Since then, my law firm has interviewed in excess of 200 individuals in both the United States and Macau to gather information relevant to the SEC subpoena, the DoJ inquiry, and the above-captioned action. We have also collected millions of potentially relevant documents, some in hard copy and some electronic, some in English, some in Chinese, and some in Portuguese. We retained forensic accountants and electronic data consultants to assist in reviewing and analyzing those materials.

5. While our investigation remains ongoing, we currently expect that the Audit Committee's inquiry will be substantially complete by the end of October 2012. We respectfully suggest that we provide the Court an update as to our progress on October 15, 2012 or on such other date that the Court desires.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23<sup>rd</sup> day of August, 2012, in Oakland, California.



Daniel Bookin